

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY	
Application for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Illinois Public Utilities Act, to Construct, Operate, and Maintain a new 345 kilovolt transmission line in Ogle, DeKalb, Kane and DuPage Counties, Illinois	Docket 13-0657 On Rehearing
BRIEF ON EXCEPTIONS	

Pursuant to § 10-111 of the Public Utilities Act, 220 ILCS 5/10-111, and § 200.830 of the Rules of Practice¹ of the Illinois Commerce Commission (the “Commission”) and the Proposed Order on Rehearing of the Administrative Law Judges (“ALJPO”) filed on March 24, 2015, Michael Petersdorf, Sarah Petersdorf, and Ellen Roberts Vogel (together, the “SP Parties”), file their Brief on Exceptions to the ALJPO. The SP Parties’ Exceptions are provided in a separate, contemporaneously filed, document.

I. Introduction

The SP Parties agree with the findings and conclusions reached in the ALJPO. The SP Parties only seek to have their argument as to routing analysis included in the ALJPO.

¹ 83 Ill. Admin. Code § 200.830

II. Argument

The ALJPO discusses the SP Parties' Position on its pages 14 through 17 where it focuses solely upon the SP Parties' argument relating to the deed restrictions. As mentioned above, the SP Parties recognize that the vast majority of the ALJPO's Commission Analysis & Conclusion section focuses on these issues, and the SP Parties agree with the findings and conclusions of the Commission. However, the final paragraph of the ALJPO's Commission Analysis and Conclusion section does discuss route-siting issues beyond the deed restrictions. ALJPO, p. 19.

The ALJPO engages in an extensive, four page, discussion of MG's routing position and arguments. ALJPO, pp. 5 – 9. Yet, it includes none of the SP Parties' routing position and argument. In doing so, the ALJPO incorrectly intimates that the SP Parties forewent addressing these issues.

In their Initial Brief on Rehearing ("IB-Reh"), the SP Parties asserted that the MG-advocated adjustments increased impacts to homes (IB-Reh, pp. 10-11, 13), increased impacts to historically significant structures (IB-Reh., pp. 12-13), increased impacts to non-residential structures (IB-Reh., pp 11, 13), and increased impacts to a school and its sports fields (IB-Reh, p. 11). It also commented on the community acceptance factor (IB-Reh, p. 12). Further, in responding to MG's Initial Brief on Rehearing, the SP Parties addressed each and every factor that the Commission considers. Those results were summarized in Table 1 of the SP Parties' Reply Brief on Rehearing ("RB-Reh"), showing the Approved Route to be vastly superior. (RB-Reh, pp. 8-9).

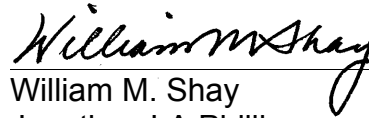
In order to fairly and accurately describe the positions of the SP Parties in the ALJPO, especially in light of MG's position on the Commission's twelve-factors, it is proper and reasonable to include a short recitation of the SP Parties position on the Commission's siting criteria.

III. Conclusion

For the foregoing reasons, the SP Parties respectfully request that the Commission modify the ALJPO consistent with this Brief on Exceptions.

Respectfully submitted,

Michael Petersdorf, Sarah Petersdorf,
and Ellen Roberts Vogel,

A handwritten signature in black ink, appearing to read "William M. Shay", is written over a horizontal line.

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